

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

ALAN FRANK,

Plaintiff,

v.

Case No. 13-CV-1149

GOLD CROSS AMBULANCE
SERVICE, INC.,

Defendant.

PLAINTIFF'S PETITION FOR APPROVAL OF ATTORNEYS' FEES

COMES NOW the Plaintiff, by and through his attorney, Walcheske & Luzi, LLC ("Class Counsel"), to respectfully petition the Court for an award of attorneys' fees as set forth below and on those grounds set forth in Plaintiff's supporting brief and the accompanying declarations of Attorneys James A. Walcheske, Larry A. Johnson, Sandra Graf Radtke, and Janet L. Heins.

1. Class Counsel has negotiated a settlement of this Fair Labor Standards Act collective action and FED. R. CIV. P. 23 class action on behalf of a class of 175 current and former employees of Gold Cross Ambulance Service, Inc.;

2. The settlement creates a settlement fund of \$155,000.00. Plaintiff petitions the Court for a recovery of attorneys' fees of \$51,666.67, equal to 33.33% of the settlement fund.

3. As set forth in greater detail in Plaintiff's supporting brief, the requested award is reasonable and consistent with the market rate in similar cases.

WHEREFORE, Plaintiff respectfully requests that the Court award attorneys' fees as set forth above.

Dated this 6th day of November, 2014.

WALCHESKE & LUZI, LLC
Counsel for Plaintiff

s/ James A. Walcheske
James A. Walcheske, State Bar No. 1065635
Scott S. Luzi, State Bar No. 1067405

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